

Defendant's Exhibit 67

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843
CONSUMER USER PROFILE Case No.
LITIGATION 18-md-02843-VC-JSC

This document relates to:
ALL ACTIONS

ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)
CORPORATE REPRESENTATIVE - MICHAEL PATRICK CLARK
(Reported Remotely via Video & Web Videoconference)
Denver, Colorado (Deponent's location)
Wednesday, May 18, 2022
Volume I

STENOGRAPHICALLY REPORTED BY:
REBECCA L. ROMANO, RPR, CSR, CCR
California CSR No. 12546
Nevada CCR No. 827
Oregon CSR No. 20-0466
Washington CCR No. 3491
JOB NO. 5210145
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1 So to recap briefly, you spoke with 10:26:34
2 Mr. Renfro for about an hour. Mr. Papagiannis for
3 about an hour. Mr. Patel for about an hour and a
4 half. We're at about three and a half.

5 Then Mr. Zarashaw for about 30 minutes. 10:26:50
6 And let's say 30 minutes for the -- each for the
7 remaining four, so that's two -- so you spent about
8 seven hours substantively preparing for this
9 deposition. And then you said you spent 35 hours
10 preparing. 10:27:05

11 Was the remainder of the time spent
12 talking to counsel?

13 A. Yes, in addition to 20 of -- hours of my
14 own time reviewing material.

15 Q. And what materials did you review for 10:27:14
16 20 hours?

17 A. Yeah. I -- I reviewed approximately
18 45 documents. The UDDP. The relevant deletion
19 controls from 2012 to present. PwC's audits from
20 2013 to 200- -- I believe '17. Wiki's describing 10:27:33
21 the technical details of deletion and the software
22 associated with. And then also reviewed the
23 25 documents which you had provided.

24 Q. And when you say you reviewed PwC's
25 audits, what specifically are you referring to? 10:27:56